

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	CASE NO.: 5:19-CR-00720
)	
)	JUDGE PATRICIA A. GAUGHAN
Plaintiff,)	
)	
vs.)	DEFENDANT’S MOTION FOR
)	PRE-PLEA PRE-SENTENCE REPORT
VERGEIOUS GOULD)	AS TO CRIMINAL HISTORY ONLY
)	
Defendant.)	

Defendant, by and through counsel, respectfully moves this Honorable Court for an order requiring the Probation Department to prepare a pre-plea pre-sentence report with respect to Defendant’s criminal history only. Counsel has learned through ongoing negotiations that the Defendant may be subject to a 21 USC §851 enhancement. Negotiations have been ongoing since the arrest of the Defendant in the case at bar and a comprehensive criminal history report of the Defendant will not only assist in continued negotiations but will expedite the process should a plea be forthcoming.

Respectfully submitted;
FERNANDO MACK, L.P.A.

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was filed electronically this 30th day of June, 2020. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail.

/s/ Fernando Mack, Esq.

FERNANDO MACK (#0062937)

Attorney for Defendant